

1 Aron M. Oliner (SBN: 152373)  
2 Geoffrey A. Heaton (SBN: 206990)  
DUANE MORRIS LLP  
3 One Market Plaza  
4 Spear Street Tower, Suite 2200  
San Francisco, CA 94105-1127  
5 Telephone: (415) 957-3000  
Facsimile: (415) 957-3001  
Email: gheaton@duanemorris.com

6  
7 Attorneys for UTILITY TREE SERVICE, LLC

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- Affects PG&E Corporation  
 Affects Pacific Gas and Electric Company  
 Affects both Debtors  
*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF DAVID B. STALL  
IN SUPPORT OF UTILITY TREE  
SERVICE, LLC'S RESPONSE TO  
REORGANIZED DEBTORS'  
TWENTY-EIGHTH OMNIBUS  
OBJECTION TO CLAIMS (BOOKS  
AND RECORDS CLAIMS)**

Date: January 27, 2021

Time: 10:00 a.m.

Place: (Telephonic Appearance Only)  
450 Golden Gate Avenue  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

Related Docket No. 9427

I, David B. Stall, declare:

1. I am Vice President of Utility Tree Service, LLC ("UTS"), a creditor in the captioned  
bankruptcy proceedings. The matters stated below are made and based upon my personal knowledge,  
except for those matters stated upon information and belief, and as to those matters I believe them to

1 be true. If called as a witness, I could and would competently testify to the matters set forth below.

2       2. The Reorganized Debtors' Twenty-Eighth Omnibus Objection to Claims (Books and  
3 Records Claims) ("Objection") requests that the Court disallow approximately \$398,740.79 of UTS's  
4 Claim No. 8068 ("Prepetition Services Claim").

5       3. The Prepetition Services Claim, in the amount of \$1,290,800.79, is based upon tree  
6 trimming services that UTS provided to debtor Pacific Gas and Electric Company.

7       4. An invoice summary reflecting the amount due and owing to UTS as of the petition  
8 date is attached to the Prepetition Services Claim.

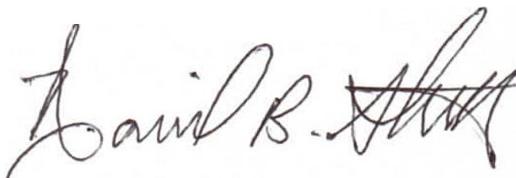
9       5. Several months ago, UTS voluntarily produced to representatives of the Debtors  
10 copies of all invoices and other relevant documents related to the Prepetition Services Claim. UTS  
11 also communicated in good faith with the Debtors' claims representatives concerning the Prepetition  
12 Services Claim and supporting documentation.

13       6. UTS contacted the Debtors' claims representatives to request an explanation of why  
14 the Debtors believe the disputed portion of the Prepetition Services Claim should not be allowed.

15       7. To date, UTS has not received a substantive response.

16       I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct. Executed on December 16, 2020, at San Diego, California.

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



DAVID B. STALL